

EXHIBIT B

Proposed Order

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Garfield Park, LLC, as Assignee and Successor
to Security Benefit Life Insurance Company*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Chapter 11

HBL SNF, LLC, d/b/a EPIC REHABILITATION
AND NURSING AT WHITE PLAINS,

Case No. 21-22623 (SHL)

Debtor.

**ORDER GRANTING RELIEF FROM THE AUTOMATIC STAY TO
SECURITY BENEFIT CORPORATION AND GARFIELD PARK, LLC**

Upon the Motion¹ of Security Benefit for entry of an order granting relief from the automatic stay to pursue state law, contractual, or any other available remedies against WPHP, including commencement of a foreclosure action in state court; and upon the Debtor's consent to the relief sought in the Motion; and, after due deliberation, the Court having concluded that Security Benefit has established sufficient cause for the relief granted herein; and no additional notice being required, now, therefore, it is hereby ORDERED that:

1. The Motion is GRANTED as set forth herein.

¹ Capitalized terms that are not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Security Benefit is hereby granted relief from the automatic stay under section 362(d) of the Bankruptcy Code to exercise any and all rights against WPHP arising out of the Loan Documents, either in law or equity including, without limitation, prosecuting a foreclosure action against WPHP in state court.

3. This order is without prejudice to any and all other rights of Security Benefit with respect to the Loan Documents, all of which are hereby reserved.

4. The relief granted in this Order shall be effective immediately and shall not be subject to the 14-day stay of enforcement under Federal Rule of Bankruptcy Procedure 4001(a)(3).

5. This Court retains jurisdiction with respect to all matters arising from or relating to implementation of this order.

Dated: New York, New York
January __, 2022

HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE